

LAYSER & FREIWALD, P.C.

ATTORNEYS AT LAW

Katherine M. Robinson

March 26, 2012

Magistrate Judge Karen M. Williams
Mitchell H. Cohen Bldg & U.S. Courthouse
4th Cooper Streets
Room 1050
Camden, NJ 08101

Re: Fried v. State Trooper Tetzlaff, et al.
No.: 02578

Dear Judge Williams:

My client recently suffered a broken leg and just left the hospital after undergoing surgery. I explained this to Mr. Rizzo multiple times and told him I was working in good faith to provide the outstanding medical authorizations as quickly as I could. In continued good faith, I wrote to Mr. Rizzo prior to receiving a copy of his March 26, 2012 letter to the Court and stated that we may need to extend the discovery deadlines in light of outstanding discovery on both sides (and after Mr. Rizzo unilaterally canceled a Defendant deposition for the second time). I asked that Mr. Rizzo please call me to discuss at his earliest convenience.

Rather than call and attempt to confer, Mr. Rizzo wrote to the Court. Specifically, Mr. Rizzo asked "that the Court intervene in this process." It is not clear what intervention Mr. Rizzo seeks:

1. He did not specifically identify any outstanding Interrogatories or Requests for Production of documents;
2. He noted that there are outstanding HIPAA authorizations which I clearly stated I would provide to him as soon as I could; and
3. He expresses a fear of completing discovery within the discovery deadlines even though I already asked him to call me to see if we could come to an agreement about extending those very deadlines.

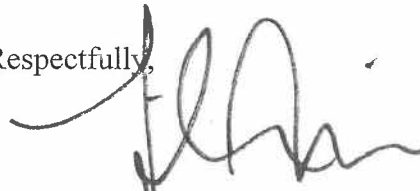
LAYSER & FREIWALD, P.C.

March 26, 2012

Page 2

With that being said, Plaintiff will provide outstanding HIPAA authorizations as soon as possible. In addition, I formally propose that the discovery deadlines in this case be extended by sixty days. Plaintiff will provide a consent order to this effect if this proposal is suitable to the Court and counsel. We are available to discuss this further at the Court's convenience.

Respectfully,

A handwritten signature in black ink, appearing to read 'K. Robinson', written over the word 'Respectfully,'.

KATHERINE M. ROBINSON

KMR/cd

cc: Vincent Rizzo, Esquire